

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Kelvin Brown

Case: 2:21-mj-30066
Assigned To : Unassigned
Assign. Date : 2/9/2021
Description: USA v. KELVIN
BROWN (CMP)(MEV)

Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 19, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 USC § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 9, 2021

City and state: Detroit, Michigan



Complainant's signature

Joshua McLean, Special Agent (ATF)
Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Joshua McLean, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I have personal knowledge of the facts set forth in this affidavit with the exception of the matters expressly stated to be based upon information and belief.

2. I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since 2014. I am currently assigned to the Detroit, Michigan Field Division, Group III. In this role, I investigate violations of firearms, arson, fraud, explosives, and narcotics laws and have been involved in numerous investigations of firearms, arson, and narcotics violations since joining the ATF. Prior to my employment with ATF, I was employed by Wayne State University Police Department for approximately three

years in the position of police officer. There, I was assigned to work with ATF Detroit Field Division Group II and also investigated violations of firearms and narcotics laws.

4. I have a Bachelor's Degree in Criminal Justice from Wayne State University. I graduated from the Washtenaw Community College Police Academy and completed both the Criminal Investigator Training Program and Special Agent Basic Training at the Federal Law Enforcement Training Center. I have also completed multiple training courses on the interstate nexus of firearms and have been to numerous firearms manufacturing facilities.

5. I am currently conducting an investigation into the violation of federal firearms laws by Kelvin Brown (B/M, DOB: XX/XX/1985), specifically 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

6. I have conducted a criminal history check (CCH) for Brown and learned Brown has been convicted of the following felony offenses:

- 2006 – 17th Circuit Court – Larceny in a Building
- 2013 – 3rd Circuit Court – Assault with a Dangerous Weapon

II. PROBABLE CAUSE

7. On November 19, 2020, Detroit police officers were on patrol in the area of Linwood St. and W. Grand Blvd. in Detroit, MI, when they observed a gray 2004 Chevrolet Tahoe driving with expired license plate tags.

8. Officers conducted a traffic stop on the vehicle and made contact with the driver of the vehicle, Kelvin Brown. Brown was unable to provide the officers with the registration or proof of insurance for the vehicle.

9. During the traffic stop, an officer observed a tactical flashlight for a firearm in the backseat of the vehicle and asked Brown twice if there were any firearms in the vehicle. After the officers inquired a second time, Brown informed the officers that there was a firearm in the vehicle.

10. Officers detained Brown outside the vehicle and searched the vehicle. Within the vehicle, the officers found a Glock, Model 19, 9mm Luger caliber pistol, loaded with an extended magazine containing 24 live rounds of ammunition. The firearm was located on the edge of the backseat, accessible to Brown. When asked by officers if he had a valid Concealed Pistol License (CPL), Brown responded that he did not have CPL. Brown later stated to officers that he knew the firearm was in the vehicle and that he obtained the firearm for protection.

11. Based on my training and experience with firearms interstate nexus and the written description of the firearm, I would conclude that the firearm was manufactured outside the State of Michigan and is a firearm as defined in Title 18 U.S.C., Chapter 44, Section 921(a)(3).

III. CONCLUSION

12. Based on the above information, I have probable cause to believe that Kelvin Brown knowingly possessed a firearm after having been convicted of a felony offense in violation of Title 18 U.S.C. Section 922(g)(1). This violation occurring within the Eastern District of Michigan.

Respectfully submitted,



Joshua McLean, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: February 9, 2021